

Remarks/Arguments

1. Drawing Objections

The drawings, as originally filed, were objected to because there was no reference numerals either in the drawings or the specification to help in explaining the detail of each element in the drawings. This application was neither prepared nor filed by the undersigned attorneys, who have since inherited the application. Indeed, a review of the application reveals that there were no reference numerals in the original drawings and specification. Further review revealed several additional errors in the drawings themselves that need correcting.

Accordingly, rather extensive drawing changes are required. For this reason, Applicant attaches hereto as Exhibit B proposed corrected drawing sheets for the Examiner's consideration. In these drawing sheets, proposed changes to the original drawings, including the addition of reference numerals, are shown in red ink. No new matter has been added. It is requested that the Examiner review and approve these drawing changes, whereupon formal replacement drawing sheets incorporating the changes will be prepared and filed. The Examiner's assistance in this regard is appreciated.

2. Replacement Specification

while the originally filed Specification was not formally objected to in the Office Action, a review revealed that numerous corrections and clarifications to the specification were called for to place it in better form and format for U. S. Patent Practice. For example, the newly added reference numerals in the drawings had to be placed in all appropriate locations in the Specification. Other clarifications, such as more appropriate figure descriptions, corrections of typographical errors, and clarification at numerous places in the Specification were required. Because of the extensive nature of these clarifications throughout the specification, it was deemed most efficient simply to provide a substitute specification. This substitute specification, in clean form, is annexed hereto in Exhibit A. A marked-up copy of the substitute specification showing all the changes relative to the originally filed version is provided above beginning at page 3. Care has been taken to assure that no new matter has been added as a result of these clarifications. Review, approval, and insertion of the substitute specification is earnestly requested.

3. Claim Rejections

Claim 1 was rejected under 35 USC §112, second paragraph, as being indefinite for failing to point out particularly and

claim distinctly the subject matter regarded by Applicant as the invention. Claim 1 has now been cancelled, rendering this objection moot.

Claim 1 also was rejected under 36 USC §103(a) as being unpatentable over *Maloney* (6,501,379). The cancellation of Claim 1 herein obviates this initial rejection.

New claims 2-18 have been added by this amendment and are believed to be allowable over the art. Each of these claims recites the basic combination of a key tag that is made at least partially of an optically transparent material so that the tag forms a light pipe. A light source, preferably an LED, is located in the security container (not on the tag itself) and is positioned to emit light into the optically transparent key tag. Because the key tag is also a light pipe, this light is transmitted through the tag with the result that the tag is illuminated and thus visible to a user of the key tracking system. Dependent claims include this feature and add other features.

The light-pipe-key-tag and separate LED in the security container, and not in the tag itself, is not taught or suggested by the art. In *Maloney* '379, each individual key tag has an internal LED that is part of the tag and not in the security

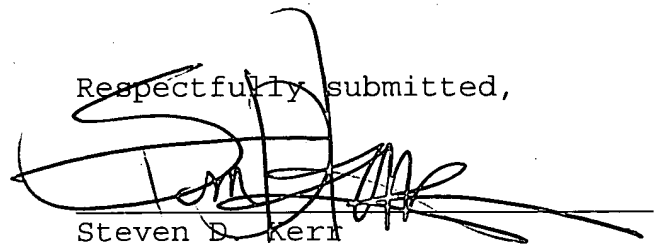
enclosure. While this approach for visually identifying a key tag works, it nevertheless has certain drawbacks, such as increasing the cost of the key tags, reducing reliability, and requiring a three-wire network to communicate with the tags and light their internal LEDs. The present invention, as claimed in new claims 2-18, eliminates these drawbacks by eliminating LEDs in each individual key tag and, instead, locating the LEDs in protected locations within the security container. The key tags, then, are made of an optically transparent material so that they function as light pipes. When an LED in the security container is lit, a key tag in the corresponding receptacle location receives and transmits the light from the LED. This causes the key tag to illuminate, thereby identifying it visually to a user.

Maloney fails to teach or suggest such a unique solution. Nowhere does *Maloney* suggest an optically transparent key tag that forms a light pipe. In fact, such would serve no purpose in *Maloney* since each individual key tag has its own internal active light source. Hence, there is absolutely no reason to modify *Maloney* by making its key tags optically transparent as claimed. Furthermore, *Maloney* teaches away from the claimed invention in that it suggests only that LEDs be placed in individual tags and nowhere suggests that LEDs be located inside the security container. Indeed, to place LEDs in such a

location in *Maloney* would result in a non-functional system since the light from such LEDs would be hidden within the drawer and could not identify any key tags in the *Maloney* sockets. Accordingly, *Maloney* fails to teach the claimed invention and there is no suggestion or motivation in the art or otherwise to modify *Maloney* to provide the elements of the claimed invention. Thus, new claims 2-18 are allowable over the art and an early notice of allowance is earnestly solicited.

In summary, replacement drawings, a replacement specification, and new claims 2-21 have been added. It is now believed that the present application is in proper form and format and that claims 2-21 are allowable. Applicant thus looks forward to an early Notice of Allowance.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Steven D. Kerr', is written over the typed name and registration number.

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